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May 30, 2019

Via ECFS

Ms. Marlene Dortch
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Notice of *Ex Parte*, PS Docket No. 07-114 and PS Docket No. 18-261

Dear Ms. Dortch,

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this letter provides notice that Charles H. Simon, Jr., CEO and Founder, Precision Broadband LLC ("Precision Broadband"), met by phone separately with:

- (1) Zenji Nakazawa, Public Safety and Consumer Protection Advisor to Chairman Pai on May 29, 2019.
- (2) Public Safety Bureau staff that included David Furth, Erika Olson, John Evanoff, Nellie Foosaner, and Rasoul Safavian on May 30, 2019.

During each of these meetings, the attached handouts were distributed and discussed, along with related points previously made in filed comments.¹ Precision Broadband emphasized during each of these meetings the importance of a role that facilities-based ISPs can play with 911 location services – similar to the role they currently play with respect to the Communications Assistance for Law Enforcement Act. Precision Broadband's system leverages the fixed broadband networks of facilities-based Internet Service Providers to provide the same real-time, accurate, dispatchable address location, including floor and unit, as is provided today with E911 landline telephone service for CMRS and non-CMRS device 911 calls.

We also shared that we fully understand the limitations ISPs have with respect to supporting the NEAD. Because Precision Broadband's system relies on network elements other than WiFi access points (i.e., NEAD), ISPs would be in a better position to provide such accurate location information on a broader scale while maintaining control of their customer's private data.

During our discussions, it was relayed that this proceeding is asking for comments on whether a 3-meter vertical location metric for 911 calls from CMRS wireless phones is a satisfactory alternative to dispatchable location - floor and unit. We acknowledge that there are already established rules for CMRS providers to provide a dispatchable vertical location. Precision Broadband's position is that while we support a metric of 3 meters where no other measurement can be feasibly obtained, we strongly favor a dispatchable

¹ Comments of Precision Broadband LLC, PS Docket No. 07-114 (filed May 20, 2019), available at <https://ecfsapi.fcc.gov/file/1052037980575/Precision%20Broadband%20Comments-PS%2007-114%202019-5-20%20.pdf>

location, including floor and unit, to be provided where technology and systems can be made available from whatever source, including Precision Broadband's ISP-based system.

We also discussed that our comments to this proceeding encompassed a number of different open proceedings, including "Implementing Kari's Law and Section 506 of RAY BAUM'S Act "(PS Docket No. 18-261). It was noted that while there are no rules that prevent ISPs from providing location services for 911 purposes, there are no rules or current proceedings that specifically address ISPs as location providers for other two-way communication providers that may be capable of providing 911 VoIP Services.

If you have questions or need additional information, please contact me anytime.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Charles H. Simon, Jr.", with a stylized flourish at the end.

Charles H. Simon, Jr.

cc: (all via email)
Zenji Nakazawa
David Furth
Erika Olson
John Evanoff
Nellie Foosaner
Rasoul Safavian